

THE KARLIN LAW FIRM LLP
L. Scott Karlin (SBN 90605)
Michael J. Karlin (SBN 272442)
Rex T. Reeves (SBN 136842)
13522 Newport Avenue, Suite 201
Tustin, California 92780
Telephone: (714) 731-3283
Facsimile: (714) 731-5741
lsk@karlinlaw.com; mike@karlinlaw.com;
rex@karlinlaw.com

Attorneys for Defendants
MOHAMED NASSER and ASKANDAR ALI ALMAWORI

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

DARREN GILBERT,

Plaintiff,

vs.

PAUL OIL COMPANY, INC.; MOHAMED
NASSER dba SAM'S MINI MART;
ASKANDAR ALI ALMAWORI dba SAM'S
MINI MART;

Defendants.

Case No. 1:22-cv-00087-DAD-EPG

**Stipulation and Order to Extend Time for
Defendants Nasser and Alkawori to Respond
to Initial Complaint**

(ECF No. 18)

Current response date: 6/3/2022

New response date: 7/1/2022

IT IS HEREBY STIPULATED by and between Plaintiff DARREN GILBERT ("Plaintiff") and
Defendants PAUL OIL COMPANY, INC., MOHAMED NASSER (sued herein as "MOHAMED
NASSER dba SAM'S MINI MART) and ASKANDAR ALI ALMAWORI (sued herein as
"ASKANDAR ALI ALMAWORI dba SAM'S MINI MART") (collectively "Defendants") (Plaintiff

1 and Defendants are referred to collectively herein as the “Parties”), by and through their attorneys of
2 record, as follows:

- 3 1. Plaintiff agrees to give Defendants an extension of time to respond to the Complaint.
- 4 2. The original due date for Defendants to respond to the Complaint was on May 6, 2022
5 (pursuant to the Court’s Order of 4/8/2022). The Parties thereafter agreed to extend the due date to June
6 3, 2022, which was approved by the Court.
- 7 3. The Parties have since then continued exploring settlement and continue to do so.
- 8 4. It is agreed and stipulated that the new due date for Defendants to respond to the Complaint
9 will be July 1, 2022. This extension of time is Defendants’ second extension and does not alter the date
10 of any event or deadline already fixed by Court order.

11 The Parties jointly request that the Court enter an Order consistent with the foregoing. Good
12 cause exists for this extension for the purpose of reducing fees and costs, as counsel are continuing to
13 explore settlement in this action, are actively involved in settlement negotiations, and believe that the
14 additional time to investigate this matter and engage in further settlement discussions that will be
15 afforded by the requested extension of time to respond to the Complaint will facilitate, and increase the
16 chances of, early settlement of this matter. It is hoped that, as a result of the requested continuance and
17 additional time to investigate and negotiate, a settlement as to all claims and all Parties will be reached
18 in this matter.

19 DATED: 5/31/2022

MOORE LAW FIRM, P.C.

21 By: /s/ Tanya E. Moore
22 Tanya E. Moore, Esq.
23 Attorneys for Plaintiff
DARREN GILBERT

24 DATED: 5/31/2022

THE KARLIN LAW FIRM LLP

26 By: /s/ Rex T. Reeves
27 Rex T. Reeves, Esq.
28 Attorneys for Defendants
MOHAMED NASSER and
ASKANDAR ALI ALMAWORI

ORDER

Pursuant to the parties' stipulation (ECF No. 18), IT IS ORDERED that the deadline for Defendants Nasser and Almawori to respond to the complaint is extended to July 1, 2022.

IT IS SO ORDERED.

Dated: May 31, 2022

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE